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d/b/a The BlenderBottle Company  
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11  
12 IN THE UNITED STATES DISTRICT COURT  
13 FOR THE EASTERN DISTRICT OF CALIFORNIA  
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15 TROVE BRANDS, LLC d/b/a THE  
BLENDERBOTTLE COMPANY, a Utah  
16 limited liability company,

17 Plaintiff,

18 v.

19 TRRS MAGNATE LLC d/b/a HYDRA CUP,

20 Defendant.  
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Case No.: 2:22-cv-02222-TLN-CKD

**PLAINTIFF BLENDERBOTTLE'S  
NOTICE OF MOTION AND MOTION  
TO COMPEL**

Date: February 7, 2024

Time: 10:00 a.m.

Ctrm: 24, 8th floor

Hon. Troy L. Nunley

Hon. Carolyn K. Delaney

**NOTICE OF MOTION AND MOTION**

**TO DEFENDANT TRRS MAGNATE LLC AND ITS COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE THAT** on February 7, 2024, at 10:00 a.m. or as soon thereafter as the matter may be heard, before the Hon. Carolyn K. Delaney on the 8th Floor, Courtroom 24 at 501 I Street, Sacramento, California, Plaintiff Trove Brands, LLC (“BlenderBottle”) will and hereby does move the Court, pursuant to Local Rule 251(a), for an order compelling Defendant TRRS Magnate LLC (“Hydra Cup”) to (1) fully respond to BlenderBottle’s Interrogatory Nos. 4, 10–13, and 15; (2) provide documents responsive to BlenderBottle’s Request for Production Nos. 6, 7, 16, 32, and 64; and (3) provide responsive communications and electronic correspondence; and for an order awarding BlenderBottle its attorneys’ fees pursuant to Fed. R. Civ. P. 37(a). BlenderBottle is serving on Hydra Cup its portion of the Joint Statement Re Discovery Disagreement concurrently herewith.

This Motion is based on this Notice of Motion and Motion to Compel; the parties’ Joint Statement re Discovery Disagreement and related declarations and exhibits which will be filed on or before January 24, 2024 pursuant to Local Rule 251; and the pleadings and papers filed in this action and any oral argument the Court may consider at this hearing.

Pursuant to Local Rule 251(b), the parties conferred on October 6, 2023, and January 3, 2024 in a good faith effort to resolve these issues but were unable to do so. Plaintiff certifies that it made numerous attempts to get Defendant to comply with its discovery obligations under the Federal Rules of Civil Procedure. These efforts, which have occurred for more than half a year, have included telephonic conferences of counsel, a series of letters, and numerous emails. Despite Plaintiff’s efforts, the parties have not resolved their differences that are the subject of this motion, including without limitation Defendant’s ongoing deficiencies in its discovery responses and document production.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: January 17, 2024

By: /s/ Jacob R. Rosenbaum

Ali S. Razai  
Sean M. Murray  
Jacob R. Rosenbaum  
Christian D. Boettcher

Counsel for Plaintiff TROVE BRANDS, LLC d/b/a THE  
BLENDERBOTTLE COMPANY

**CERTIFICATE OF SERVICE**

I am a citizen of the United States of America and I am employed in Irvine, California. I am over the age of 18 and not a party to the within action. My business address is 2040 Main Street, Fourteenth Floor, Irvine, California.

On January 17, 2024, I served **PLAINTIFF BLENDERBOTTLE'S NOTICE OF MOTION AND MOTION TO COMPEL** on Defendant TRRS Magnate LLC d/b/a Hydra Cup shown below via CM/ECF:

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MEGHAN PRATSCHLER  
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I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on January 17, 2024, at Irvine, California.

/s/ Claire Stoneman  
Claire Stoneman